

LOEVY + LOEVY

Alyssa Martinez <alyssa@loevy.com>

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**RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena**

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**Alyssa Martinez** <alyssa@loevy.com>

Tue, Nov 12, 2024 at 6:00 AM

To: "Epstein, Aaron D." <ADEpstein@columbus.gov>

Cc: "Dirisamer, David J." <DJDirisamer@columbus.gov>, "Tanoury, Alana V." <AVTanoury@columbus.gov>, "Dorsey, Dexter W." <DWDorsey@columbus.gov>, "Feldkamp, Sarah N." <SNFeldkamp@columbus.gov>, Jon Loevy <jon@loevy.com>, Michele Berry-Godsey <mberrylaw2007@gmail.com>, Melinda Ek <melinda@loevy.com>, Christine Tran <tran@loevy.com>

Dear Counsel:

Thank you again for your time on Friday.

As the parties discussed, Plaintiff sends along some case law on the issues discussed for your consideration:

Plaintiff relies on case law from the 6th Circuit concerning relevance under Fed. R. Civ. P. 26(b)(1), motions to quash under Rule 45(d)(3), and/or motions for protective orders under Rule 26(b)(2) and 26(c). While irrelevance and overbreadth are not specifically listed under Rule 45 as a basis for quashing a subpoena, courts in this district have held that "the scope of discovery under a subpoena is the same as the scope of discovery under Rule 26." *TCYK, LLC v. Does 1-47*, No. 2:13-CV-539, 2013 WL 4805022, at \*4 (S.D. Ohio Sept. 9, 2013) (quoting *Hendricks v. Total Quality Logistics, LLC*, 275 F.R.D. 251, 253 (S.D. Ohio 2011)).

As Plaintiff stated on the call, he stands on his objections to this subpoena insofar as it is overly broad, unduly burdensome, disproportionate to the needs of the case, irrelevant, and infringes upon his privacy interests—particularly when the relevant component (Plaintiff's wages since being released) are discoverable through the subpoenas issued to all of his employers since 2004. *See, e.g., Omokehinde v. Detroit Bd. of Educ.*, 251 F.R.D. 261, 267 (E.D. Mich. 2007) (denying defendants' motion to compel and issuing a protective order over plaintiff's bank records because tax returns and earnings statements were sufficient to establish damages from lost income whereas bank records were "much less relevant" and "would likely contain a great deal of personal information (such as expenditures) that has no relevance whatsoever to this case."); *Anderson v. Old National Bancorp.*, No. 5:02-CV-00324-R, 2010 WL 5463397 at \*2 (W.D. Ky. Dec. 29, 2010) (holding that the court must balance competing factors such as: (1) relevance, (2) need, (3) confidentiality, and (4) harm when deciding whether or not to grant a protective order); *Serrano v. Cintas Corp.*, 699 F.3d 884, 901 (6th Cir. 2012) (quoting 8A Charles Alan Wright & Arthur R. Miller et al., *Federal Practice and Procedure* § 2036 (3d ed. 2012) (in determining whether to grant a protective order and thus protect a party from annoyance, embarrassment, oppression, or undue burden or expense, "even very slight inconvenience may be unreasonable if there is no occasion for the inquiry and it cannot benefit the party making it."); *Popeck v. Rawlings Co. LLC*, No. 3:16-CV-138-GNS, 2017 WL 11725427, at \*6 (W.D. Ky. Apr. 6, 2017) (granting motion for protective order over financial records because subpoena was, among other things, temporally overbroad, prejudicial to plaintiff, and not proportionate to needs of case considering "minimal relevance" to central issues in case.); *Moore v. WesBanco Bank, Inc.*, 612 F. App'x 816, 822 (6th Cir. 2015) (holding that while there is no fundamental right to privacy in one's financial records, plaintiff may still have a right to privacy in his financial information); *compare State Farm Mut. Auto. Ins. Co. v. Pointe Physical Therapy, LLC*, 255 F. Supp. 3d 700, 707 (E.D. Mich. 2017), *aff'd*, No. 14-CV-11700, 2017 WL 3116261 (E.D. Mich. July 21, 2017) (denying motion for protective order, in part, because the parties do not otherwise have access to the relevant banking information).

Please let us know Defendants' position as soon as possible so we may timely raise the issue with the Court if need be. Plaintiff is more than willing to continue conferring if Defendants are amenable to narrowing their subpoena or discussing further. I will be out of the office for most of Tuesday but am available to confer Wednesday afternoon or Thursday/Friday after the depositions scheduled in this case. Please also continue to instruct Huntington Bancshares to not produce responsive records until this is resolved.

Thank you,  
Alyssa

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**Alyssa Martinez** (she/her)

 **LOEVY + LOEVY**

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311 N Aberdeen St, Chicago, IL 60607

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On Thu, Nov 7, 2024 at 3:53 PM Alyssa Martinez <alyssa@loevy.com> wrote:

Dear Counsel:

Thanks for the quick response. Plaintiff is available to confer at 2pm Eastern Time tomorrow. Please use this call-in information:

(US) +1 515-518-4903  
PIN: 569 397 763#

Thank you,  
Alyssa

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**Alyssa Martinez** (she/her)



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On Thu, Nov 7, 2024 at 2:07 PM Epstein, Aaron D. <ADEpstein@columbus.gov> wrote:

Alyssa,

We would like to discuss the Huntington Bank subpoena with you. I am genuinely unclear what information the bank records could contain that is *not* germane to this case or that could infringe on Mr. Horton's privacy interests. We are available tomorrow morning between 9:00 a.m. and 12:00 p.m. (Eastern time), or from 2:00 p.m. to 4:00 p.m. Let us know what works.

Thanks,

Aaron

**From:** Alyssa Martinez <alyssa@loevy.com>

**Sent:** Thursday, November 7, 2024 2:54 PM

**To:** Dirisamer, David J. <DJDirisamer@columbus.gov>

**Cc:** Tanoury, Alana V. <AVTanoury@columbus.gov>; Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; Jon Loevy <jon@loevy.com>; Michele Berry-Godsey <mberrylaw2007@gmail.com>; Melinda Ek <melinda@loevy.com>; Christine Tran <tran@loevy.com>

**Subject:** Re: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Dear Counsel:

Plaintiff writes in regard to Defendants' subpoena to Huntington Bancshares. As Plaintiff stated in his response to Defendants' Oct. 16 correspondence, he objects to the production of his bank account records following his release from prison on the grounds that it is overly broad, unduly burdensome, disproportionate to the needs of the case, irrelevant, and infringes upon his privacy interests.

Plaintiff stated his belief that the request as currently framed lacks specificity in its scope, seeking a broad range of financial records that could include highly personal and private information unrelated to the subject matter of the case. Plaintiff further stated that his objection is not to the production of any bank information; rather, it is to the sweeping and intrusive nature of the request in its current form, which is the same request reflected in this subpoena.

Plaintiff also notified Defendants that if they seek specific records directly tied to his damages—such as documentation specifically identifying income received from work release or earnings claimed as lost wages—Mr. Horton would be willing to consider a narrowly tailored request limited to records directly relevant to the damages claims. However, bank records reflecting Plaintiff's financial status back at the time of the robbery, the only time for which his bank records are relevant to the facts of this case, have already been produced, and Defendants' subpoena to that bank has already received a response.

As such, Plaintiff intends to move to quash this subpoena this week. However, should Defendants wish to discuss the scope of the subpoena, in line with Plaintiff's concerns outlined above, and see if we can come to an agreement on a narrowed scope, we are more than happy to do so. Please let us know by COB tomorrow, so we may timely seek Court intervention if necessary.

Additionally, please notify Huntington Bancshares that Plaintiff is objecting to production of responsive records, which may necessitate Court intervention, and, as such, to not produce anything until the Court has ruled on the issue.

Thank you, as always, for your cooperation in this matter.

Best,  
Alyssa

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**Alyssa Martinez** (she/her)

Office: (312) 243-5900  
311 N Aberdeen St, Chicago, IL 60607  
[www.loevy.com](http://www.loevy.com)

On Tue, Nov 5, 2024 at 10:39 AM Dirisamer, David J. <DJDirisamer@columbus.gov> wrote:

Counsel,

Attached please find subpoenas issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.

**Sent:** Thursday, October 31, 2024 9:42 AM

**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>

**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>;

Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find a subpoena issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Thursday, October 17, 2024 1:55 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find subpoenas issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Thursday, October 17, 2024 12:24 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find subpoenas issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Friday, October 11, 2024 8:42 AM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find subpoenas issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Thursday, October 10, 2024 12:26 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find subpoenas issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Monday, October 7, 2024 12:50 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find a subpoena issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Friday, October 4, 2024 3:33 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find subpoenas that were issued today in the above matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Monday, September 9, 2024 4:19 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find a letter to Rhonda Curry that was served on her on September 6 along with the subpoena attached to my email below.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Monday, September 9, 2024 3:42 PM

**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Service of Subpoena

Counsel,

Attached please find a subpoena to Rhonda Curry for her deposition on September 27, along with proof of service of that subpoena.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Friday, September 6, 2024 1:19 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; 'Alyssa Martinez' <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; 'Jon Loevy' <jon@loevy.com>; 'Michele Berry-Godsey' <mberrylaw2007@gmail.com>; 'Melinda Ek' <melinda@loevy.com>; 'Christine Tran' <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Subpoenas Issued

Counsel,

Attached please find subpoenas issued today in this matter.

Thank you.

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**From:** Dirisamer, David J.  
**Sent:** Monday, August 19, 2024 4:48 PM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>; Alyssa Martinez <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; Jon Loevy <jon@loevy.com>; Michele Berry-Godsey <mberrylaw2007@gmail.com>; Melinda Ek <melinda@loevy.com>; Christine Tran <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Subpoenas Issued

Counsel,

Attached please find subpoenas issued today in this matter.



Thank you.

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**From:** Tanoury, Alana V. <AVTanoury@columbus.gov>  
**Sent:** Monday, August 19, 2024 1:02 PM  
**To:** Alyssa Martinez <alyssa@loevy.com>  
**Cc:** Epstein, Aaron D. <ADEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; Dirisamer, David J. <DJDirisamer@columbus.gov>; Jon Loevy <jon@loevy.com>; Michele Berry-Godsey <mberrylaw2007@gmail.com>; Melinda Ek <melinda@loevy.com>; Christine Tran <tran@loevy.com>  
**Subject:** RE: [EXTERNAL] Horton v. City of Columbus - Ms. Curry's Deposition

Counsel,

Thank you for your message. We plan to depose all of the witnesses identified in Plaintiff's initial disclosures, but would like to start by scheduling the following depositions: Rhonda Curry, Richard Horton, Kim Curry, Shelli Curry, Riccardo Diggs/ Richard Diggs, and Cynthia Searcy. Please let us know dates that will work in September.

Additionally, Brenda Walker is available for her deposition on September 17, 18, 23, 24, and 25. Please let us know if any of those dates work.

Thank you,

Alana

**Alana Tanoury**

Assistant City Attorney



77 N. Front Street

Columbus, OH 43215

614-645-6945



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**From:** Alyssa Martinez <alyssa@loevy.com>  
**Sent:** Friday, August 16, 2024 7:41 AM  
**To:** Tanoury, Alana V. <AVTanoury@columbus.gov>  
**Cc:** Epstein, Aaron D. <AEpstein@columbus.gov>; Dorsey, Dexter W. <DWDorsey@columbus.gov>; Feldkamp, Sarah N. <SNFeldkamp@columbus.gov>; Dirisamer, David J. <DJDirisamer@columbus.gov>; Jon Loevy <jon@loevy.com>; Michele Berry-Godsey <mberrylaw2007@gmail.com>; Melinda Ek <melinda@loevy.com>; Christine Tran <tran@loevy.com>  
**Subject:** Re: [EXTERNAL] Horton v. City of Columbus - Ms. Curry's Deposition

Dear Counsel:

We will have proposed dates to you later today to reschedule Ms. Curry's deposition along with proposed dates for Plaintiff and third parties.

Plaintiff also has several third parties he intends to depose, including other Columbus police officers, so we will send proposed dates and a preliminary list to see if there are any individuals that overlap.

Thanks,

Alyssa

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**Alyssa Martinez** (she/her)

Office: (312) 243-5900  
311 N Aberdeen St, Chicago, IL 60607  
[www.loevy.com](http://www.loevy.com)

On Wed, Aug 7, 2024 at 11:16 AM Tanoury, Alana V. <AVTanoury@columbus.gov> wrote:

Counsel,

We are checking with Brenda Walker regarding dates for her deposition and will get back to you soon.

We would like to reschedule Rhonda Curry's deposition as soon as possible, so please provide a few dates that will work for you.

Additionally, could you please send us dates that will work for Plaintiff Horton's deposition?

Finally, we would like to subpoena additional third-party witnesses for depositions. Could you please provide dates in September that will work?

Thank you,

Alana

**Alana Tanoury**

Assistant City Attorney



77 N. Front Street

Columbus, OH 43215

614-645-6945



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**From:** Alyssa Martinez <[alyssa@loevy.com](mailto:alyssa@loevy.com)>

**Sent:** Tuesday, August 6, 2024 12:47 AM

**To:** Tanoury, Alana V. <[AVTanoury@columbus.gov](mailto:AVTanoury@columbus.gov)>

**Cc:** Epstein, Aaron D. <[ADEpstein@columbus.gov](mailto:ADEpstein@columbus.gov)>; Dorsey, Dexter W. <[DWDorsey@columbus.gov](mailto:DWDorsey@columbus.gov)>; Feldkamp, Sarah N. <[SNFeldkamp@columbus.gov](mailto:SNFeldkamp@columbus.gov)>; Dirisamer, David J. <[DJDirisamer@columbus.gov](mailto:DJDirisamer@columbus.gov)>; Jon Loevy <[jon@loevy.com](mailto:jon@loevy.com)>; Michele Berry-Godsey <[mberrylaw2007@gmail.com](mailto:mberrylaw2007@gmail.com)>; Melinda Ek <[melinda@loevy.com](mailto:melinda@loevy.com)>; Christine Tran <[tran@loevy.com](mailto:tran@loevy.com)>

**Subject:** Re: [EXTERNAL] Horton v. City of Columbus - Ms. Curry's Deposition

Dear Counsel:

Plaintiff's original email was only sent to apprise the parties of a last minute conflict so that Ms. Curry's deposition could be rescheduled in line with the federal rules and so that we would not need to re-open her deposition at a future date because Plaintiff could not be in attendance to ask his questions or make objections for a witness who is critical to his case-in-chief.

However, as the jury verdict has come back, Plaintiff no longer has a conflict and is prepared to proceed should Ms. Curry appear tomorrow. I left a message for her to disregard my earlier call.

Because of our conflict, we cannot appear in person and will thus be attending via Zoom. Please send the Zoom link and ensure that Ms. Curry will be able to see the screen as we have exhibits we would like to put in front of

her.

Separately, please advise dates that work for Defendants for Plaintiff to notice Defendant Walker's deposition.

Thank you,

Alyssa

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**Alyssa Martinez** (she/her)

Office: (312) 243-5900  
311 N Aberdeen St, Chicago, IL 60607  
[www.loevy.com](http://www.loevy.com)

On Mon, Aug 5, 2024 at 2:29 PM Tanoury, Alana V. <[AVTanoury@columbus.gov](mailto:AVTanoury@columbus.gov)> wrote:

Counsel,

We are not aware of any authority that would permit you to excuse a witness from appearing pursuant to a subpoena that we served. We have left a message for Ms. Curry letting her know she is obligated to appear tomorrow, and we plan to move forward with her deposition if she appears.

To be clear, you never contacted us prior to telling Ms. Curry she does not need to comply with our subpoena, and we did not agree to excuse her or postpone the deposition. We previously agreed at your request to reschedule Ms. Curry's June 25, 2024 deposition, which was noticed on May 29, 2024 (ECF No. 24), due to your last minute unavailability. We re-subpoenaed Ms. Curry for a deposition on August 6, 2024 because Attorney Martinez stated that Plaintiffs' counsel was available on that date. Ms. Curry properly served with the subpoena, and we also filed an amended notice of her August 6, 2024 deposition with the Court (ECF No. 28). As I stated on June 25, 2024, we intend to keep the August 6, 2024 deposition date firm to avoid any further confusion or inconvenience for Ms. Curry.

We have no objection to you attending in person, by zoom, or by telephone.

Respectfully,

Alana

**Alana Tanoury**

Assistant City Attorney



77 N. Front Street

Columbus, OH 43215

614-645-6945



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**From:** Alyssa Martinez <[alyssa@loevy.com](mailto:alyssa@loevy.com)>

**Sent:** Monday, August 5, 2024 1:31 PM

**To:** Epstein, Aaron D. <[ADEpstein@columbus.gov](mailto:ADEpstein@columbus.gov)>; Dorsey, Dexter W. <[DWDorsey@columbus.gov](mailto:DWDorsey@columbus.gov)>; Feldkamp, Sarah N. <[SNFeldkamp@columbus.gov](mailto:SNFeldkamp@columbus.gov)>; Tanoury, Alana V. <[AVTanoury@columbus.gov](mailto:AVTanoury@columbus.gov)>; Dirisamer, David J. <[DJDirisamer@columbus.gov](mailto:DJDirisamer@columbus.gov)>

**Cc:** Jon Loevy <[jon@loevy.com](mailto:jon@loevy.com)>; Michele Berry-Godsey <[mberrylaw2007@gmail.com](mailto:mberrylaw2007@gmail.com)>; Melinda Ek <[melinda@loevy.com](mailto:melinda@loevy.com)>; Christine Tran <[tran@loevy.com](mailto:tran@loevy.com)>

**Subject:** [EXTERNAL] Horton v. City of Columbus - Ms. Curry's Deposition

Dear Counsel:

I hope this finds you well. Plaintiff's counsel is on a trial that ran long, so we need to reschedule Ms. Curry's deposition tomorrow for sometime next week. Is there a specific day that works best on your end? I have called Ms. Curry to let her know and ensure her appearance next week in line with the subpoena that was already served on her. We appreciate your flexibility.

Thanks,  
Alyssa

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**Alyssa Martinez** (she/her)

Office: (312) 243-5900  
311 N Aberdeen St, Chicago, IL 60607  
[www.loevy.com](http://www.loevy.com)